

FILED
LOGED
RECEIVED

MAIL

OCT 29 2021

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY
BY

Civil Action

No.

Complaint

21-CV-1477 RAJ-JRCMichael A. Hayes
Plaintiff

-VS-

Defendants

1) Jurisdiction & Venue

1) This is a civil action authorized by 42 U.S.C. Section 1983 to redress the deprivation, under color of State law, of rights secured by the Constitution of the United States. The court has jurisdiction under 28 U.S.C. Section 1331 and 1343 (a)(3). Plaintiff Hayes seeks declaratory relief pursuant to 28 U.S.C. Section 2201 and 2202. Plaintiff Hayes claims for relief are authorized by 28 U.S.C. Sections 2283, 2284 and Rule 65 of the Federal Rules of Civil Procedure.

2) The Western District of Washington is not a proper venue under 28 U.S.C. Section 1391 (b)(2). Because of prejudice against plaintiff in prior filings of motion to ~~dismiss~~ amend complaint.

3) Plaintiff Hayes was a prisoner of Maysville city jail and now resides in King County Jail awaiting sentencing.

4) Defendants _____ & _____ of the Maysville city jail employees. They are legally responsible for the operation of Maysville Jail and the welfare of all inmates at the jail.

5) Each defendant is sued individually and in his official capacity. At all times each defendant acted under color of State law.

1) Facts

6) at all times inmate Hayes was held in Safety Cell in A block of Maysville city jail, confined in isolation for alleged medical reasons.

Facts continued

On April 18th 2020 Plaintiff Hayes was arrested for minor violations of the law, Two misdemeanors to be exact, Upon entering Muncyville Jail The Booking officer made a decision to put Plaintiff in isolation based on alleged medical reasons without proper medical care or even be seen by a medical professional. There was no doc to back by county therefore holding Hayes in isolation cell without just cause of medication Hayes stated he was under Dr.'s care and was denied medical attention. Once in isolation cell Hayes cooperated fully with staff but was still held in isolation. The use of a Safety cell must be limited according to the Federal laws. Use of "Chinese toilet" are forbidden by Federal law & deemed Hazardous as of these is no running water, phone privileges or writing material what so ever. Hayes was not allow access to phone or even grievance process as he was told to be quiet and await Judge's orders. Hayes complied and even Co-operated in an interview with detectives in unrelated case from King county.

Legal claims

1) Use of Safety cell is only to be used extreme cases and for very short amount of time, 4 days is excessive and blatant disregard for Hayes Constitutional rights of legal phone call within 72 hours of incarceration. Running water to wash after use of Restroom and lack of medical care were also violations against Hayes.

Prayer for Relief

Wherefore, Plaintiff respectfully pray that this court enter Judgment:

1) Granting Plaintiff Hayes a declaration that the acts and omissions described herein violate his rights under the constitution and laws of United States and a preliminary & permanent injunction ordering defendants to cease there use of Safety cell & cease there policy of refusing use of phone for inmates confined in Safety cell.

2) Granting relief and compensatory damages in the amount of \$50,000 against each defendant, jointly & severally.

3) Plaintiff Hayes seeks compensatory damages of \$5000 From against Booking officer only.

4) Plaintiff seeks nominal damages and punitive damages in the amount of \$50,000.

5) Plaintiff also seek a jury trial on all issues triable by jury.

6) Plaintiff also seeks recovery of costs in this suit and any additional relief this court deems just & proper & Equitable.

Dated Oct, 22, 2021

Respectfully Submitted Michael Allen Hayes 220008340

Malicious Regional Justice Center

870 West Jones St

Kent WA 98032

Signed Michael Allen Hayes.

To: Clerk Western Washington District Court
 From: Michael Allen Hayes 220008340
 RE: New Complaint / New ~~Defendants~~ / Separated From prior Litigation

OCT 29 2021

I Michael A. Hayes hereby submit new Complaint naming Booky officer -----, medical officer and property officer at the Marysville city Jail. I was held for over 72 hrs in Safety cell without a clear for Booky short from county of Snohomish. I was alleged in a luxury change and subsequently arrested in Marysville. Booky officer stated I was held in safety cell for medical reasons which were not verified by a professional medical attendant or doctor. I was put there as punishment for lying to police about my name and for observation of withdrawal from prescribed medication. I informed the detective of my need for Zyprexa & Suboxone at the interrogation process on 4-19-20. I was denied medical attention and forced into isolation with no running water, phone or writing utensils to quize the policy. Nor was I allowed access to recreation "Time out of cell" or proper hygiene materials. This was a violation of my civil rights and therefore this civil action is being filed before the 2 yr mark which is my allotted time to file 1983 motion. This is separate From Officer Blake and Detective Blakenau's 1983 motion as of these are separate issues by Mr. Signed Michael Hayes
 Dated Oct 23, 2021

New

Complaint

Separately

Defective Blah blah et al

Additional

new documents requested

To file separate motion or

separate complaint.

Name: Michael Anthony
Kkg. # 220008340
King County Correctional Facility
620 West James Street
Kent, WA 98032



Seattle P&DC 981
WED 27 OCT 2021 PM

Clerk, United States District Court
United States Courthouse
700 Stewart Street, Suite 2310
Seattle WA 98101



OCT 29 2021

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY